

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES OF AMERICA**

**v.**

**ABDUL WAHAB KHAN,**

**Defendant.**

**Case No. 1:19-CR-19**

**DEFENDANT'S SECOND SUPPLEMENTAL  
MEMORANDUM IN AID OF SENTENCING**

Defendant Abdul Wahab Khan, by and through undersigned counsel, respectfully submits this second supplemental memorandum in aid of sentencing. The purpose of this memorandum is to transmit to the Court some additional letters and materials that counsel obtained after the filing of Mr. Khan's previous submissions. These includes a certificate of excellence awarded to Mr. Khan by the detention facility for his participation in the inmate work force program, and two additional letters submitted in support of Mr. Khan, all of which are attached as Exhibit A.


These materials reinforce two aspects of Mr. Khan's character important to the Court's determination of his sentence. *See* 18 U.S.C. § 3553(a)(1) (directing court to consider "the history and characteristics of the defendant").

First, Mr. Khan still wishes to improve himself and, to that end, he has participated whenever possible in programs in the facilities in which he has been detained. At the sentencing hearing, Mr. Khan intends to request that the Court recommend to the Bureau of Prisons that he be sent to a facility where he will have access to educational programs so that he may finish his college education. The institutions where Mr. Khan has been imprisoned in California have had few if any educational or other programs, and Mr. Khan prioritizes this opportunity over being

located close to his family.

Second, like many of the letters submitted with Mr. Khan's previous submissions, the letters attached to this memorandum show Mr. Khan's compassion for and willingness to help others. These redeeming qualities support a sentence that will permit Mr. Khan to rejoin and be a productive member of society, rather than a sentence which will keep him in prison for most of the remainder of his adult life.

Respectfully submitted,



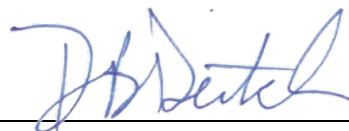
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### **CERTIFICATE OF SERVICE**

I hereby certify that, on July 25, 2018, I caused a copy of the foregoing document to be filed with the Clerk of the Court using the CM/ECF System, which will send a Notice of Electronic Filing to the parties in this matter, all of whom have an email address of record and have appeared and consented to electronic service in this action.



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David B. Deitch